

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

REGIONS ASSET COMPANY,

Plaintiff,

v.

REGIONS UNIVERSITY, INC.

Defendant.

Civil Action No. 2:06-cv-882-MHT

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's Order dated October 24, 2006, a meeting was held on November 13, 2006 via telephone and was attended by:

William G. Pecau, Charles B. Paterson, and Paul A. Clark on behalf of Plaintiff Regions Asset Company; and

Victor T. Hudson and William W. Watts III on behalf of Defendant Regions University, Inc.

1. **Pre-Discovery Disclosures.** The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) on or before December 15, 2006.
2. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

Plaintiff expects to conduct discovery necessary to support the plaintiff's claims.

Defendant expects to conduct discovery on the facts and circumstances of this case.

- a. All discovery commenced in time to be completed by August 15, 2007.
- b. Maximum of 50 interrogatories by each party to each party. Responses due 30 days after service.
- c. Maximum of 50 requests for admission by each party to each party. Responses due 30 days after service.

- d. Maximum of 50 requests for production of document by each party to each party. Responses due 30 days after service.
- e. Maximum of 10 depositions of lay witnesses and 2 expert witnesses by Plaintiff to Defendant and 10 depositions of lay witnesses and 2 expert witnesses by Defendant to Plaintiff. Depositions limited to seven hours.
- f. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiff by June 15, 2007; and
from Defendant by July 15, 2007.
- g. Supplementation under Rule 26(e) due reasonably upon knowledge of additional information.

3. **Other Items.**

- a. The parties do not request a conference with the Court before entry of the scheduling order.
- b. The parties request a final pretrial conference on or before October 15, 2007.
- c. Plaintiff should be allowed until May 15, 2007 to join additional parties and to amend the pleadings.
- d. Defendant should be allowed until May 30, 2007 to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed on or before August 1, 2007.
- f. Settlement cannot be realistically evaluated prior to the completion of preliminary discovery.
- g. Final lists of trial evidence under Rule 26(a)(3), both witnesses and exhibits, should be due from the parties on or before September 1, 2007 with the opportunity afforded to depose any previously unidentified witness; notwithstanding the discovery cut-off date.
- h. Parties should have 14 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).
- i. The case should be ready for trial by this Court's November 26, 2007 trial term. At this time, the trial is expected to take approximately 2 days.

Respectfully submitted this 13th day of November, 2006.

/s/Paul A. Clark

One of the Attorneys for Plaintiff Regions Asset
Company

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/s/William W. Watts, III

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